REMARKS/ARGUMENTS

Prior to the entry of this amendment, claims 1-10, 12-23 and 31-44 were pending in this application. Claims 1, 20, 31, 37, and 43 have been amended, no claims have been added and no claims have been canceled herein. Therefore, claims 1-10, 12-23 and 31-44 remain pending in this application. Applicant respectfully requests reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Durand in view of Shen, in further view of Hunt, and in further view of Lee

The Office action has rejected claims 1, 2, 4-10, 12-17, 20, 21, 23, 31, 33-37 and 39-44 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 5,694,598 to Durand et al. (hereinafter "Durand") in view of U. S. Patent No. 5,596,746 to Shen et al. (hereinafter "Shen"), in further view of U.S. Patent No. 6,564,370 to Hunt (hereinafter "Hunt") and in further view of U.S. Patent Pub. No. 2002/0143943 of Lee et al. (hereinafter "Lee"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, all claimed limitations must first be taught or suggested by the prior art. *See, e.g.*, *DyStar Textilfarben GmbH & Co. Deutschland KG v. C.H. Patrick Co.*, 464 F.3d 1356, 1360 (Fed. Cir. 2006). The Office Action must then provide an explicit analysis supporting the rejection. *See KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1741 (2007) ("a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art"). While the Office Action can use one of several exemplary rationales from the MPEP to support an obviousness rejection under *KSR*, all the rationales still require the Office Action to demonstrate that all the claim elements are shown in the prior art. *See* MPEP §2143. As will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, the cited references do not teach or suggest, alone or in combination, determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Furthermore, none of the references teach or suggest, alone or in combination, determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part.

Durand "relates to methods for mapping data between an object-oriented data model and a relational data model." (Col. 1, lines 8-10) Durand discloses a method of mapping from a plurality of objects to a relational database that includes generating and populating a transit object with data from the objects, populating a data structure with the information from the transit object, and finally populating the relational database based on the structure. (Col. 3, lines 1-21) Durand's method of mapping from the relational database to the objects is essentially the reverse process, i.e., populating the data structure with information from the relational database, populating the transit object based on the data structure, and populating the objects with data from the transit object. (Col. 3, lines 22-39) However, Durand does not teach or suggest determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Furthermore, Durand does not teach or suggest determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part.

Shen provides "a method and apparatus for transforming data base schemas to object models." Under Shen "the data base schema is mapped into instances in an ideal table meta model. Next, the information in the ideal table meta model is mapped into instances in an object meta model. Finally, the information in the object meta model is used to generate a file compatible with an object modeling tool for the purpose of displaying, in graphical form, the object model on a visual display device of a computer." (Col. 1, lines 60-67) However, Shen does not teach or suggest, alone or in combination with Durand, determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Furthermore, Shen does not teach or suggest, alone or in combination with Durand, determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part.

Hunt is directed to "providing directory services in a distributed computing environment and, in particular, to a method for associating a signature with a given attribute in a directory" (Col. 1, lines 9-12). However, Hunt does not teach or suggest, alone or in combination with Durand and/or Shen, determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Rather, Hunt only notes that "although the preferred embodiment has been described in the context of an LDAP directory, for example, **with a**

relational database backing store, the inventive attribute signature technique and schema may be implemented in any distributed directory." (Col. 6, line 65 – col. 7, line 2, emphasis added) That is, Hunt mentions using a relational database as a backing store for the LDAP directory but does not teach or suggest selecting or determining a relational database to service a request from a plurality of mixed data stores, i.e., including at least one LDAP directory and at least one relational database. Furthermore, Hunt does not teach or suggest how such a determination may be made. Thus, Hunt also fails to teach or suggest, alone or in combination with Durand and/or Shen, determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part.

In summary, the combination of Durand, Shen, and Hunt is no more relevant to the pending claims than any of these references alone since none of the references, alone or in combination, teach or suggest determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Rather, Durand teaches translation between an object-oriented data model and a relational data model, Shen teaches an ideal table meta model used to generate a file to be used by a modeling tool in generating a graphical representation of an object model, and Hunt describes use of an LDAP directory with a relational database backing store but not determining a relational database, i.e., selecting a relational database from between the LDAP directory and the relational database, to service a request. Furthermore, none of the references, alone or in combination, teach or suggest determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part.

In response to these arguments, the final Office Action agrees that "the combination of Durand, Shen, and Hunt do not explicitly teach wherein determining the relational database from the plurality of data stored comprises comparing the filter for accessing the data of the attributes to a partitioning expression for each of the data stores." (final Office Action page 7) In an effort to demonstrate such a teaching, the final Office Action then turns to Lee. However, the Applicants respectfully contend that Lee does not teach or suggest partitioning expressions or determining a relational database based thereon as recited in the pending claims.

Lee is directed to supporting multiple data stores, i.e., in an Identity System. (paragraph 11) Under Lee:

> "The Identity System includes partition support for fat and flat tree directories using filters. From a configuration page, an attribute can be configured to be accessible (read, modify, etc.,) based on a two part filter. The first component in the filter identifies a top node in the directory. The filter will only apply to those entities at or below that top node. The second component of the filter is an LDAP filter which defines who can access the attribute. This two component filter can be applied on an attribute by attribute basis." (paragraph 148)

However, Lee does not teach or suggest, alone or in combination with the other references, a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part.

Independent claim 1, upon which claims 2-10 and 12-19 depend and independent claim 20, upon which claims 21-23 depend both recite in part "receiving a request to access data for a first attribute, wherein the request includes the first attribute and a filter for accessing the data for the first attribute; determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory and wherein determining the relational database from the plurality of data stores comprises comparing the filter for accessing the data for the first attribute to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part." None of the references, alone or in combination, teach or suggest determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Furthermore, none of the references, alone or in combination, teach or suggest determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part. For at least these reasons, the rejection should be withdrawn and claims 1-10 and 12-23 should be allowed.

Independent claim 31, upon which claims 32-36 depend, independent claim 37, upon which claims 38-42 depend, and independent claim 43, upon which claim 44 depends, each recite in part "receiving a request to access data for a first attribute, said request identifies said data in a first data format, said first data format includes objects, said objects include one or more attributes and wherein the request includes the first attribute and a filter for accessing the data for the first attribute; determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory and wherein determining the relational database from the plurality of data stores comprises comparing the filter for accessing the data for the first attribute to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part." None of the references, alone or in combination, teach or suggest determining a relational database from a plurality of data stores to service said request, wherein the plurality of data stores comprises the relational database and at least one LDAP directory. Furthermore, none of the references, alone or in combination, teach or suggest determining the relational database from the plurality of data stores by comparing a filter for accessing the data for the first attribute included in the request to a partitioning expression for each of the data stores defining data stored in the data store, wherein the partition expression is in an LDAP filter format and comparing the filter for accessing the data for the first attribute to the partition expression for each of the data stores comprises determining whether the filter for accessing the data for the first attribute and the partition expression overlap at least in part. For at least these reasons, the rejection should be withdrawn and claims 31-44 should be allowed.

35 U.S.C. § 103 Rejection, Durand in view of Shen, in further view of Hunt, in view of Lee, and in further view of Bachmann

The Office Action has rejected claims 3, 22, 32 and 38 under 35 U.S.C. § 103(a) as being unpatentable over Durand in view of Shen, in further view of Hunt, in view of Lee, and in further view of U. S. Patent No. 6,085,188 to Bachmann et al. (hereinafter "Bachmann"). Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 3, 22, 32 and 38 each depend upon base claims that are thought to be allowable as discussed in detail above.

35 U.S.C. § 103 Rejection, Durand in view of Shen, in further view of Hunt, in view of Lee, and in further view of Henninger

The Office Action has rejected claims 18 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Durand in view of Shen, in further view of Hunt, and further in view of U. S. Patent No. 5,499,371 to Henninger et al. (hereinafter "Henninger"). Applicant respectfully requests withdrawal of the rejection and allowance of the claims for at least the reason that claims 18 and 19 both depend upon independent claim 1 which is though to be allowable as discussed in detail above.

CONCLUSION

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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